

From: [George T. Williamson](#)
To: [Geoppinger, Jeff](#)
Cc: [D'Lesli M. Davis](#); [aslater](#); [Ellie Norris](#); [Campbell, Daniel](#); [Dennis, Mimi](#); [lhilton@meyerwilson.com](#); [Christopher Geddis](#); [dstanoch@kanner-law.com](#); [John Davis](#)
Subject: RE: [EXT]Meet and Confer Re Wholesaler Indemnity Issues
Date: Monday, May 02, 2022 9:13:00 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Jeff, we were surprised to see your filing in last week's CMC agenda. The Wholesaler Defendants are the only group who refuse to provide any information pursuant to our March 17, 2022 letter and SMO 64. If it was unclear during the meet and confer as to what information we need, we are still hopeful that you will provide the following information on behalf of your clients:

1. Who did you have supplier agreements with (or any such agreement) that contained defend and indemnify provisions?
2. Who have you asked for tender of a defense and/or indemnification?
3. Who has asked you for tender of a defense and/or indemnification?
4. Who has agreed to tender your clients' defense and/or indemnification?
5. Who have you agreed to tender a defense and/or indemnify?
6. Disclose the status of any dispute, litigation, mediation, or arbitration between Defendants related to the above agreements.

We believe that SMO 64 requires this information, at the very least. If you have a different understanding of the order we are happy to discuss further, though please keep in mind that we will be filing our final report with the Court tomorrow.

Thanks,

George

George T. Williamson | Director
FARR, FARR, EMERICH, HACKETT, CARR & HOLMES, P.A.
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From: Geoppinger, Jeff <jgeoppinger@ulmer.com>
Sent: Monday, April 18, 2022 4:10 PM
To: George T. Williamson <gwilliamson@farr.com>; aslater <aslater@mazieslater.com>
Cc: D'Lesli M. Davis <dlesli.davis@nortonrosefulbright.com>; Ellie Norris <ellie.norris@nortonrosefulbright.com>; Campbell, Daniel <DCampbell@crowell.com>; Dennis, Mimi <MDennis@crowell.com>; lhilton@meyerwilson.com; Christopher Geddis <CGeddis@mazieslater.com>; dstanoch@kanner-law.com; John Davis <jdavis@slackdavis.com>
Subject: RE: [EXT]Meet and Confer Re Wholesaler Indemnity Issues

George:

Wholesalers are available at 4 pm EST tomorrow. I will have a calendar invite sent.

Jeff

Jeffrey D. Geoppinger
Ulmer & Berne LLP
p 513.698.5038
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From: George T. Williamson <gwilliamson@farr.com>
Sent: Monday, April 18, 2022 10:16 AM
To: Geoppinger, Jeff <jgeoppinger@ulmer.com>; aslater <aslater@mazieslater.com>
Cc: D'Lesli M. Davis <dlesli.davis@nortonrosefulbright.com>; Ellie Norris <ellie.norris@nortonrosefulbright.com>; Campbell, Daniel <DCampbell@crowell.com>; Dennis, Mimi <MDennis@crowell.com>; hilton@meyerwilson.com; Christopher Geddis <CGeddis@mazieslater.com>; dstanoch@kanner-law.com; John Davis <jdavis@slackdavis.com>
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Jeff, we are requesting confirmation from the wholesalers of the items in our letter dated March 17, 2022, and as ordered in SMO 64.

I am available after 4pm ET today, and tomorrow afternoon from 2pm ET on. Let me know what works best for you.

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From: Geoppinger, Jeff <jgeoppinger@ulmer.com>
Sent: Friday, April 15, 2022 3:04 PM
To: aslater <aslater@mazieslater.com>; George T. Williamson <gwilliamson@farr.com>
Cc: D'Lesli M. Davis <dlesli.davis@nortonrosefulbright.com>; Ellie Norris <ellie.norris@nortonrosefulbright.com>; Campbell, Daniel <DCampbell@crowell.com>; Dennis, Mimi <MDennis@crowell.com>
Subject: [EXT]Meet and Confer Re Wholesaler Indemnity Issues

Adam/George:

Pursuant to the Court's directive that the parties meet and confer by April 30, 2022, regarding indemnity issues, Wholesalers would like to have an initial, collective call to understand from Plaintiffs what information they are requesting from Wholesalers concerning indemnity issues. Please let us know if you and/or another member of the Plaintiffs' Executive Committee are available for a call on the afternoon of April 18 or on April 19 to discuss Plaintiffs' requests. Thanks.

Jeffrey D. Geoppinger



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